

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(NEWARK VICINAGE)

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JEAN MICHAEL MECHIN,

Plaintiff,

**Civil Action No.: 07-5824
(SDW)(ES)**

-against-

CARQUEST CORPORATION; CARQUEST
PRODUCTS, INC.; TMC ENTERPRISES;
VOLTEC INDUSTRIES; TASCO; BWP
DISTRIBUTORS, INC.; and ABC
CORPORATIONS 1-10 (said names presently
unknown and fictitious),

**REPLY CERTIFICATION OF
SCOTT HAWORTH IN SUPPORT
OF VOLTEC INDUSTRIES, LLC'S
MOTION FOR SUMMARY
JUDGMENT**

Defendants.

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Scott Haworth, under penalty of perjury, affirms as follows:

1. I am an attorney at law, duly licensed to practice in the State of New Jersey, and a Member of Haworth Coleman & Gerstman, LLC, attorneys for defendant, Voltec Industries, LLC ("Voltec"). I am fully familiar with all matters set forth herein.

2. This Reply Certification is submitted in further support of Voltec's summary judgment motion. Voltec also incorporates and respectfully refers the Court to the arguments and evidence set forth in its summary judgment motion, the

defendants' joint motion to preclude plaintiff's experts, and Voltec's opposition to plaintiff's summary judgment motion and his Daubert motion.

3. As a supplement to the exhibits already before the Court, Voltec also relies on the following exhibits:

- **Exhibit A** –UL Application;
- **Exhibit B** – TMC Electrical Website.

4. For the reasons set forth in Voltec's Reply Brief and the accompanying exhibits, Voltec's motion for summary judgment should be granted.

Dated: April 12, 2011



Scott Haworth (SH 5890)
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